

## PRIVACY POLICY SUMMARY

### CONTACT DETAILS

#### Data Controller:

**FORNI INDUSTRIALI BENDOTTI - S.P.A.** (fiscal code, VAT number and Italian Business Register – Company Registration Office of Bergamo registration number 00231840166, REA BG - 112786, share capital Euro 520.000,00, fully paid-up)

**Registered Address:** Costa Volpino (BG), Via Zoncone n. 34, CAP 24062

**E-mail address:** info@bendotti.it

**Registered e-mail address:** bendotti@legalmail.it

**Telephone number:** +39 035 988108

**Fax:** +39 035 988115

### PURPOSES AND SERVICES USED FOR PERSONAL DATA PROCESSING

#### Purpose of Personal Data processing:

##### - **Contact the User**

Methods of Personal Data processing:

- Contact form

Personal Data: name, telephone number, e-mail address.

##### - **Statistics and performance**

Methods of Personal Data processing:

- Google Analytics (anonymized IP), Google Tag Manager, Google Optimize, Google Optimize 360

Personal Data: Cookies and Usage Data

##### - **Displaying content from external platforms / third parties**

Methods of Personal Data processing:

- Google Maps, Instagram, Linkedin, Youtube, Google Fonts

Personal Data: Cookies; Usage Data; other types of Data.

##### - **Behavioral targeting, remarketing and advertising**

Methods of Personal Data processing:

Query Click, Welect

Personal Data: Cookies; Usage Data; other types of Data.

- **C.M.S. (Content Management System)**

Methods of Personal Data processing:

- WordPress.com

Personal Data: various types of Data.

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## **PRIVACY POLICY**

**The Data Controller**, as better defined below, takes care of its Users privacy and guarantees that the Personal Data processing is carried out in compliance with the privacy legislation in force, and in particular with the European Regulation no. 2016/679 and the national legislation on the personal data protection.

Therefore, **the Data Controller** has adopted the following Privacy Policy in order to regulate and inform the Users of the Website [www.bendotti.it](http://www.bendotti.it) of the methods and purposes of processing Users Personal Data.

The User is kindly requested to read this document every time he connects to the Website, in order to update on any revisions, additions and / or modifications, occasioned by regulatory requirements and / or by changes and / or additions to the functionality of the Website itself.

### **Data Controller:**

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### **COLLECTED DATA TYPES**

Among the Personal Data collected by [www.bendotti.it](http://www.bendotti.it) (hereinafter "the Website"), either independently or through third parties (see their privacy policy), there are: e-mails, various type of Personal Data as better specified below, cookies and Usage Data.

In the related sections of this Privacy Policy or through specific information texts displayed before the Data collection, the User can find all the details of each type of Data.

The Personal Data may be freely provided by the User or, in the case of Usage Data, collected automatically by the Website.

Unless otherwise specified, the Data requested are necessary to provide the Service.

In cases of optional Data, Users can refrain from communicating such Data, **without any consequence on the availability of the Service or on its operation.**

Users who have any doubt about which Data are mandatory are invited to contact the Data Controller.

The collection of any Cookies by the Website or by third party services used by the Website, unless otherwise specified, has the purpose of providing the Service requested by the User, and any other purposes described in this document and in the Cookie Policy, if available.

The User assumes liability for the third parties Personal Data obtained, published or shared through the Website and guarantees to have the right to communicate or share them, holding harmless the Data Controller for any related claim.

#### **METHOD AND PLACE OF COLLECTED DATA PROCESSING**

The Data Controller takes appropriate security measures to prevent Personal Data unauthorized access, disclosure, modification or destruction.

Data are processed by means of IT and/or telematic tools, by implementing organizational methods and strategies that are connected to the purposes of the activity.

Other subjects involved in the Data Controller organization and/or in the Website management (for example: administrative, commercial and marketing staff, lawyers, system administrators, etc.) or external subjects (for example: accountants, external legal advisors, third party technical service providers, postal couriers, hosting providers, IT companies, communication agencies, e- mail marketing service providers, etc.) may have access to the Personal Data. These subjects may be also appointed Data Processors by the Data Controller, if necessary. The Processors updated list can always be requested to the Data Controller.

#### **DATA PROCESSING LEGAL BASIS**

The legal bases of the Data Controller processing of User's Personal Data are specified below:

- the Data Subject has given consent to the processing of his or her Personal Data for one or more specific purposes, pursuant to GDPR, art. 6, paragraph 1, letter a). Note: in some jurisdictions the Data Controller may be authorized to process Personal Data without the User's consent or another of the legal bases specified below, as long as the User does not object ("opt-out") to such processing. However, this is not applicable if the Personal Data processing is governed by European legislation on the protection of personal data;
- Personal Data processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract, pursuant to GDPR, art. 6, paragraph 1, letter b);
- Personal Data processing is necessary for compliance with a legal obligation to which the Data Controller is subject, pursuant to GDPR, art. 6, paragraph 1, letter c);
- Personal Data processing is necessary in order to protect the vital interests of the Data Subject or of another natural person, pursuant to GDPR, art. 6, paragraph 1, letter d);
- Personal Data processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Controller, pursuant to art. 6, paragraph 1, letter e) of the GDPR;

- Personal Data processing is necessary for the purposes of the legitimate interests pursued by the Data Controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the Data Subject which require protection of personal data, in particular where the Data Subject is a child, pursuant to GDPR, art. 6, paragraph 1, letter f).

Pursuant to GDPR, art. 6, the Personal Data acquired by the Website without the consent of the interested party will be processed by the Data Controller to manage and maintain the Website, to allow the use of Services, to satisfy Users' requests, to allow effective communication with customers, to fulfill the obligations established by law, regulations, community legislation or orders of the Authorities or in any case for purposes connected to the activities and functions of the Data Controller, or to prevent or discover fraudulent activities or abuses to the detriment of the Data Controller through the Website.

It is always possible to ask the Data Controller to specify the legal basis of each Processing and, in particular, whether the Processing is based on the law, provided for by a contract, or necessary to conclude a contract.

### **PLACE OF PERSONAL DATA PROCESSING**

The Data are processed at Data Controller Offices and/or legal and/or operational headquarters and/or at any other place where the parties involved and/or (external) Data Processors IT systems / servers are located. For more information, the User is invited to contact the Data Controller.

The User's Personal Data may be transferred to a different country from the User one. To obtain further information on the processing place, please see the Privacy Policy related section.

The User has the right to obtain information about the legal basis connected to any transfer of Personal Data to a third country outside the European Union or to any international organization governed by public international law or consisting of two or more countries (e.g. the UN) as well as regarding all the security measures adopted by the Data Controller to protect his/her Personal Data. Concerning such Personal Data transfers, please see the Privacy Policy related sections or request information to the Data Controller (see "CONTACT DETAILS" section).

### **DATA STORAGE PERIOD**

The Data are processed and stored for the time required by the collecting purposes.

The User can contact the Data Controller (as specified in the "CONTACT DETAILS" section) to obtain further information regards the Personal Data processed retention period.

At the end of the retention period, the Personal Data will be deleted.

Therefore, on expiry of that period, the right of access, erasure, rectification, data portability, object, restriction of processing can no longer be exercised.

### **PURPOSE OF COLLECTED DATA PROCESSING**

The User's Personal Data are collected to allow the Data Controller to provide its Services, as well as for the following purposes:

- **Contact the User**
- **Statistics and performance**
- **Displaying content from external platforms/ third parties**

- **Behavioral targeting, remarketing and advertising**
- **C.M.S. (Content Management System)**

To obtain further detailed information on these purposes and on the Personal Data processed for each purpose, see the following section.

## **DETAILS ON THE PERSONAL DATA PROCESSING**

### **1) Contact the User:**

In order to contact the User, the Data Controller may use the Personal Data collected with the following tools:

-Contact form

Personal Data: name, telephone number, e-mail address.

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### **2) Statistics and performance**

These services allow the Data Controller to monitor and analyze traffic data and to keep track of User behavior, by means of the following tools:

#### **- Google Analytics with anonymized IP**

Google Analytics is a web analysis service provided by Google for statistical purposes to track and examine the Website use, compile reports and share them with other services developed by Google.

Google Analytics may use cookies to collect information and generate statistics on the Website use, without providing personal information on individual visitors. The User's IP address is anonymized. Anonymization works by shortening the IP address of Users within the borders of the member states of the European Union or in other European Economic Area countries.

Only in exceptional circumstances, the IP address will be sent to Google's servers and shortened within the United States.

Personal Data: Cookies and Usage Data.

In relation to the Personal Data processing methods and place, the User is invited to carefully see the related Privacy Policy.

Please note that the Personal Data may also be processed outside the EEA.

As of July 16, 2020, Google no longer rely on the EU-U.S. Privacy Shield to transfer Data that originated in the EEA or the UK to the U.S, and from September 30, 2020, it uses the standard contractual clauses approved by the European Commission, based on the adequacy decisions of the European Commission.

Please see Google [privacy policy](#) and cookie policy, "[How can I grant or revoke consent to the use of Cookies?](#)" section to disable Google cookies - a.k.a. Opt-out and also the [Privacy Shields](#) section.

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#### **- Google Tag Manager**

This Web-Site uses Google Tag Manager.

Google Tag Manager is a tag management system provided by Google LLC and used to manage JavaScript and HTML tags used for tracking and analytics on websites. Tags are small code elements that, among other things, are used to measure visitor traffic and his/her behavior, to understand the effect of online advertising and social channels, to set up remarketing and orientation towards target groups and to test and optimize websites.

The Tag Manager tool itself (which implements the tags) is a cookie-free domain and does not record Personal Data. This tool allows the activation of other tags that can, for their part, record Data in certain circumstances.

For more information on Google's privacy policy, please consult the following link <https://policies.google.com/privacy?hl=en> .

For Google terms of use see this link: <https://www.google.com/analytics/tag-manager/use-policy/> and for Google Tag Manager privacy faq <https://support.google.com/tagmanager/answer/7207086> .

Personal Data: Usage Data; other types of data.

#### - **Google Optimize**

Google Optimize is a service provided by Google Ireland Limited for A/B testing that allows you to test different versions of the Web-Site pages and consequently to evaluate which one between two strategies produces the best result, in such a way as to obtain a greater number of conversions. The User's Personal Data may be used by Google to contextualize and personalize the advertisements managed by the Google itself.

For more information on Google's privacy policy, please consult the following link <https://policies.google.com/privacy?hl=en>

Personal Data: Usage Data; other types of data.

#### - **Google Optimize 360**

Google Optimize 360 is a service provided by Google Ireland Limited for A/B testing: it groups Users (who have left Google Analytics enabled) on the basis of their past use of the Web-Site, in order to evaluate their behavior for targeting and persistence purposes.

The User's Personal Data may be used by Google to contextualize and personalize the advertisements managed by the Google itself.

For more information on Google's privacy policy, please consult the following link <https://policies.google.com/privacy?hl=en> .

Personal Data: Usage Data; other types of data.

### **3) Displaying content from external platforms/ third parties**

This service allows you to view content hosted on and interact with external platforms directly from the Website, by means of the Redirect / Sharing buttons.

It may collect traffic data relating to the pages where it is installed, even if it is not actually used.

#### - **Google Maps**

Google Maps is a map viewing service managed by Google LLC or by Google Ireland Limited (it depends on the location in which the Website is viewed), which allows the Website to integrate such content within its pages.

Personal Data: Cookies; Usage data; other types of Data.

In relation to the Personal Data processing methods and place, the User is invited to carefully see the related Privacy Policy.

Please note that the data may also be processed outside the EEA.

As of July 16, 2020, Google no longer rely on the EU-U.S. Privacy Shield to transfer data that originated in the EEA or the UK to the U.S, and from September 30, 2020, it uses the standard contractual clauses approved by the European Commission, based on the adequacy decisions of the European Commission.

Please see Google [privacy policy](#) and cookie policy, "[How can I grant or revoke consent to the use of Cookies?](#)" section to disable Google cookies - a.k.a. Opt-out and also the [Privacy Shields](#) section.

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#### - **Instagram, Instagram Widget**

On the Web-Site there are redirection or sharing buttons to the Instagram social platform owned by Meta Platforms Ireland Limited and to the individual social network pages attributable to the Controller.

Instagram shares information worldwide, both internally with Instagram companies and externally with partners and with the people with whom the User connects.

According to the related policies, Instagram uses cookies, pixels, local storage technologies and other similar technologies to show advertising content, to offer the service and for reasons related to its use, as well as to collect information about the User use of Instagram. Instagram could also use these technologies to remember the choices made by the User (eg. User name, language or geographical area in which the User is located) and customize the Service to offer better functions and content. Instagram and its advertising partners may use these technologies to show advertisements targeted to the interests of the User. This information may be shared with organizations outside of Instagram, such as advertisers and/or networks of advertisers for the publication of ads and for measuring the effectiveness of advertising campaigns.

The information could be transferred and/or transmitted and/or stored and processed in the United States or in other countries outside the User's residence or in any case outside SEE.

The User is also advised that from July 16, 2020 Instagram no longer bases the processing of Users' Personal Data on the EU-U.S. [Privacy Shield](#) (EU-US Privacy Shield) to transfer data from the European Economic Area and the United Kingdom to the United States; but uses [standard contractual clauses](#) approved by the European Commission and based on the [adequacy decisions](#) of the European Commission regarding certain countries, as appropriate, for data transfers from the EEA to the United States and other countries.

In relation to the Privacy Shield, the User is referred to reading the relevant paragraph in the cookie policy.

In this case, the following Personal Data are processed: Cookies; Usage data; other types of data.

For more information on the installation and use of cookies by Instagram, the User is requested to carefully read the relevant [cookie policy](#). Please read the [privacy policy](#) of the service carefully to obtain detailed

information on the collection and transfer of Personal Data, on the User's rights and on how to configure your privacy settings.

With reference to the [conditions of use of the Instagram](#) service, the User is finally invited to consult the aforementioned conditions.

#### - **LinkedIn**

LinkedIn is a third-party social networking tool owned by LinkedIn Ireland Limited Company that allows You to connect different workers, professionals and companies, also providing statistics on use and interactions on the platform.

The Controller have neither knowledge of, nor any influence over the possible collection and processing of User Data by LinkedIn. If the User opens its profile on LinkedIn, his/her Data may be forwarded to the United States of America.

Therefore, the User is invited to carefully read the LinkedIn privacy policy at <https://www.linkedin.com/legal/privacy-policy> and eventually change the LinkedIn settings, following the instructions in their privacy policy.

The LinkedIn advertising cookie can be deactivated (opt-out) here: <https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out>

Personal Data: Cookies; Usage data; other types of data.

#### - **YouTube**

YouTube is a network for sharing videos owned by Google Ireland Limited. The data provided directly by you and by YouTube will be used exclusively for marketing purposes such as better reach of the specific target group, increase visibility, image building, User information and employer branding and/or statistics.

In case the User visit our YouTube channel, YouTube and its parent company Google collects his/her IP address and other personal information using cookies.

If the User is logged in to his/her YouTube channel and visit our YouTube profile, this may be associated with his/her profile.

By creating a YouTube channel, we contribute to the processing of our visitors' personal information, irrespective of whether they are registered or logged in to YouTube. Although YouTube provides us with certain data collected through cookies or concerning our videos in an anonymous form, the compilation of these statistics is based on the previous processing of personal data.

If the User is logged in with YouTube, he/she agree to YouTube's terms of use, privacy and cookie policies and to YouTube's processing of his/her Personal Data.

We have no influence on the Data collection and further processing by YouTube, to what extent this happens and how long this data is stored.

For more information, please visit YouTube/Google privacy policy: <https://policies.google.com/privacy?hl=en>.

Personal Data: Cookies; Usage data; other types of data.

#### - **Google Fonts**

Google Fonts is a font style displayer service owned by Google Ireland Limited, which allows this Web-Site to integrate them into its pages. For this purpose, if the User has not cached the specific fonts required by this Web-Site in his browser cache, your browser establishes a direct connection to Google's servers to download the correct files.

In this case, Google can identify, for example, your IP address which receives the characters to be displayed. For more information, please visit Google privacy policy: <https://policies.google.com/privacy?hl=en>.

Personal Data: Cookies; Usage data; other types of data.

#### **4) Behavioral targeting, remarketing and advertising**

##### **- Query Click**

Query Click is an advertising service provided by Query Click Ltd.

For more information, please visit Query Click [privacy policy](#).

Personal Data: Usage Data, Cookies, other types of data.

##### **- Welect**

Welect is an advertising service provided by Welect GmbH.

For more information, please visit Welect [privacy policy](#).

Personal Data: Usage Data, Cookies, other types of data.

#### **5) C.M.S. (Content Management System)**

The Website is created using C.S.M. WordPress.

##### **- WordPress.com**

Personal Data: various types of Data.

The User is invited to read carefully the related [privacy policy](#).

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#### **PRIVACY SHIELD**

Privacy Shield between EU and US is a self-certification mechanism for companies established in the US that process Personal Data received from European Union. It was deemed adequate by the European Commission in 2016.

In compliance with the principles contained therein, the companies undertake to provide adequate protection tools to the interested parties (i.e. all the Data Subjects whose Personal Data have been transferred from the European Union). If not, they are removed from the certified companies list ("Privacy Shield List") by the US Department of Commerce and can be subjected to sanctions by the Federal Trade Commission.

However, on July 16, 2020, the Court of Justice of the European Union (CJEU) (2016/1250 Decision of on the adequacy of the protection offered by the EU-US privacy shield regime - cd. "[Schrems II Judgment](#)") declares the Privacy Shield inadequate to protect Personal Data received from EU to a company established in United States.

The standard contractual clauses were instead confirmed as valid for Personal Data transfer from EU to non-EU country (in accordance with European Court of Justice's decision 2010/87).

The User is invited to see [FAQs relating to the Schrems II](#) ruling and its effects drafted by the European Data Protection Committee (EDPB), the website [www.privacyshield.gov](http://www.privacyshield.gov) and the Data Protection Authority's website to better understand the issue and monitor further developments.

## DATA COMMUNICATION AND TRANSFER

The Data Controller processes Personal Data with the utmost care and confidentiality.

User data may be disclosed to third parties.

The Data Controller may use (external) Data Processors and service providers during the Data Processing in order to provide the services such as, for example, authentication services, hosting and maintenance, data analysis services, e-mail messaging services, delivery services, payment transactions management, creditworthiness, address and e-mail checking.

Some of the Data Processors / service providers referred to in the section above are located outside European Union (EU) / European Economic Area (EEA). In these cases, the Data Controller guarantees that:

- the country located outside EU/EEA is considered a safe third country;
- the Data Processor / service provider has adhered to the European Commission's standard contracts relating to the Personal Data transfer to third countries;
- the Data Processor / service provider is certified according to art. 40 of the GDPR or
- the Data Processor / service provider has a set of approved binding corporate rules.

The User's Personal Data may be communicated or shared in order to comply with a legal obligation or with the indications of a Court / Judicial Authority or any other competent body or in order to enforce or apply the Website Privacy Policy and / or other agreements or to protect any rights or safety of the Data Controller, Data Processors, service providers and / or other third parties or to protect against fraud or reduce credit risk.

## USER RIGHTS

With reference to the Data processed by the Controller, the User can exercise the following rights:

- **right to withdraw consent at any time.** The User can revoke the previously expressed consent to his/her Personal Data processing (see GDPR, art. 7);
- **right of access.** The User has the right to obtain from the Data Controller confirmation as to whether or not Personal Data concerning him/her are being processed, and, where that is the case, access to his/her Personal Data and receive all the information about them (including the purposes of the processing), as well a copy of the aforementioned Data (see GDPR, art. 15);
- **right to rectification of his/her Personal Data.** The User has the right to obtain from the Data Controller without undue delay the rectification of inaccurate Personal Data concerning him/her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal Data completed, including by means of providing a supplementary statement (see GDPR, art. 16);
- **right to erasure ("right to be forgotten").** The User has the right to obtain from the Data Controller the erasure of Personal Data concerning him/her without undue delay in these events: if the Personal Data are no longer necessary or the User withdraws consent on which the processing is based and there is no other legal ground for the processing or if the User objects to the processing or the Personal Data have been unlawfully processed or if they have to be erased for compliance with a legal obligation in Union or Member

State law to which the Data Controller is subject or if the Personal Data have been collected in relation to the offer of information society services (see GDPR, art. 17);

- **right to restriction of processing.** The User shall have the right to obtain from the Data Controller restriction of processing in these events: if the accuracy of the Personal Data is contested by the User or if the processing is unlawful and the Data Subject opposes the erasure of the Personal Data and requests the restriction of their use or if the User who has objected to processing is waiting for the verification whether the legitimate grounds of the Data Controller override those of the User (see GDPR, art. 18);

- **right to data portability.** The User has the right to receive the Personal Data concerning him/her, which he/she has provided to the Data Controller, in a structured, commonly used and machine-readable format and has the right to transmit those Data to another data controller without hindrance from the Data Controller to which the personal data have been provided (see GDPR, art. 20);

- **right of object to Personal Data processing.** The User can object at any time to processing of personal data concerning him/her (when it's carried out on a legal basis other than consent). In particular, where Personal Data are processed for direct marketing purposes, the User has the right to object at any time to processing of Personal Data concerning him/her for such marketing, which includes profiling to the extent that it is related to such direct marketing (see GDPR, art. 21);

- **right to lodge a complaint with the competent supervisory authority.** The User can lodge a complaint with the competent Personal Data protection supervisory authority (in Italy: [www.garanteprivacy.it](http://www.garanteprivacy.it)) and before the competent courts of the Member States (see GDPR, art. 77 and following).

### **How to exercise your rights**

To exercise the aforesaid rights, the User, without paying any fees or charge (except for the provisions of GDPR, art. 12 paragraph 5), can address a request to the Data Controller and precisely to:

### **CONTACT DETAILS**

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**E-mail address:** [info@bendotti.it](mailto:info@bendotti.it)

**Registered e-mail address:** [bendotti@legalmail.it](mailto:bendotti@legalmail.it)

**Telephone number:** +39 035 988108

**Fax:** +39 035 988115

### **Cookie Policy**

The Website uses Cookies. For more detailed information, the User is invited to read the [Cookie Policy](#).

### **Further information on the Data processing**

#### **Defense in court**

The User's Personal Data may be used for defense by the Data Controller in judicial proceedings or in preliminary stages prior to their possible initiation, against abuses in the use thereof or in related Services by the User.

The User declares to be aware that the Data Controller may be obliged to disclose / communicate the Personal Data by order of the public authorities.

### **Specific information**

Upon a User's request, in addition to the information contained in this Privacy Policy, the Website can supply additional and targeted information about special Services and about the collection and processing of Personal Data.

### **System log and maintenance**

For needs related to operation and maintenance, the Website and any third-party Services it uses may collect system logs, which are files that record the interactions and which may also contain Personal Data, such as User IP address.

### **Information not contained in this Privacy Policy**

Further information related to the Personal Data processing can be requested at any time at the Data Controller (see the "CONTACT DETAILS" section).

### **Changes to this Privacy Policy**

The Data Controller reserves the right to modify or update, at any time, this Privacy Policy.

The User is invited to check this page regularly to ensure he/she always knows the latest version of this Privacy Policy (see the "Last update" date at the end of this page).

If the changes affect Personal Data processing whose legal basis is consent, the Data Controller will collect the User's consent again, if necessary.

## **DEFINITIONS AND LEGAL REFERENCES**

### **"Cookie" or "Cookies"**

Small portion/s of data stored in the User's device.

### **"Personal Data" or "Data"**

Any information relating to a Data Subject.

### **"Usage Data"**

All the information collected automatically through the Website and/or by third-party applications, including: IP addresses or domain names of the computers used by the User to connect to the Website, addresses in URI (Uniform Resource Identifier), time of the request, the method used to forward the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response from the

server (success, error, etc.), the country origin, browser and operating system features, time features (for example, time spent on each page), the details about the actions taken (sequence of the pages the User has visited, operational system parameters and IT environment).

#### **"Data Subject"**

The identified or identifiable natural person to whom the Personal Data refers. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological genetic, mental, economic, cultural or social identity of that natural person.

#### **"Data Processor" or "Manager" or "Data Processors" or "Managers"**

The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Data Controller, as set out in this Privacy Policy.

#### **"Service" or "Services"**

The Service/Services provided by the Website as specified in the relative terms (if available) on this Website/application.

#### **"Website"**

The hardware and software tool through which the Personal Data of Users are collected and processed, and precisely [www.bendotti.it](http://www.bendotti.it).

#### **"Controller" or "Data Controller"**

The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data; where the purposes and means of such processing are determined by Union or Member State law, the Controller or the specific criteria for its nomination may be provided for by Union or Member State law.

The Data Controller, as better identified above, unless otherwise specified, is the owner of the Website.

#### **"Processing" or "Data Processing"**

Any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

#### **"European Union" or "EU"**

Unless otherwise specified, any reference to the European Union contained in this document is intended to be extended to all current member states of the European Union and of the European Economic Area (so-called EEA).

#### **"User" or "Users"**

The individual or individuals who use the Website/application. Unless otherwise specified, he/she coincides with the Data Subject.

#### **Legal references**

This Privacy Policy has been drawn up on the basis of current legislation on the subject (including national legislation) and in particular in accordance with the provisions of Regulation (EU) 2016/679 (so-called GDPR), articles 13 and 14.

**Last update: April 27<sup>th</sup>, 2022.**